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March 24, 2023

VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singer v. Bank of Palestine*, No. 19-cv-0006 (ENV)(RML)

Dear Judge Levy:

In accordance with the Court's docket order of March 10, 2023, we write on behalf of all parties to provide a further status report concerning the additional review of Tape 6 by an independent vendor.

As anticipated, the parties have retained Forensic Risk Alliance as the independent vendor to conduct the review, and have executed FRA's engagement agreement. Additionally, earlier this week, the parties, their respective IT experts, and FRA conducted a teleconference to discuss the logistics of transferring the Tape 6 data from Sullivan|Strickler to FRA. Further to that discussion, Sullivan|Strickler and BOP's IT expert, Mr. Regard, are communicating directly with FRA to coordinate the transfer of the Tape 6 data to FRA and are including Plaintiffs' counsel on all communications.

The parties respectfully propose to submit a further status report no later than April 28, 2023.

Respectfully submitted,

/s/ Gassan A. Baloul
Gassan A. Baloul

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